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8  
9 UNITED STATES DISTRICT COURT  
10 SOUTHERN DISTRICT OF CALIFORNIA  
11

12 SASAN MIRKARIMI, individually and  
on behalf of all others similarly situated,

13 Plaintiff,

14 vs.

15 NEVADA PROPERTY 1, LLC, a  
16 Delaware limited liability company  
DBA THE COSMOPOLITAN HOTEL  
17 OF LAS VEGAS, and DOES 1-50,  
inclusive,

18 Defendant.  
19

CASE NO. 12-CV-2160 BTM (DHB)

**NOTICE OF MOTION AND  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: June 19, 2015

Time: 11:00 a.m.

Ctrm: 15B

Judge: Hon. Barry Ted Moskowitz

**PER CHAMBERS,  
NO ORAL ARGUMENT UNLESS  
REQUESTED BY COURT**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on June 19, 2015 at 11:00 a.m. in Courtroom  
3 15B of the above-captioned Court, located at 333 West Broadway, San Diego,  
4 California 92101, the Honorable Barry Ted Moskowitz presiding, Plaintiff Sasan  
5 Mirkarimi will and hereby does move the Court for an order preliminarily approving  
6 the proposed class action settlement agreement entered into between Plaintiff and  
7 Defendant Nevada Property 1 LLC, d/b/a The Cosmopolitan of Las Vegas.

8 This unopposed motion is made pursuant to Rule 23(e) of the Federal Rules  
9 of Civil Procedure and is made on the ground that the proposed settlement  
10 agreement merits preliminary approval in view of the extent of discovery conducted  
11 in this action, the arm's-length nature of the settlement negotiations, the  
12 representation of the putative class by experienced counsel, the terms of the  
13 settlement, and other factors relevant to court approval of class action settlement  
14 agreements.

15 This motion is based on this Notice, the Memorandum of Points and  
16 Authorities filed herewith, the Declaration of James T. Hannink filed herewith, the  
17 court record in this action, and any argument or evidence as the Court may consider  
18 at the hearing of this motion.

19 Dated: May 8, 2015

DOSTART CLAPP HANNINK &  
COVENEY, LLP

21  
22 /s/ James T. Hannink  
JAMES T. HANNINK  
23 Attorneys for Plaintiff

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